

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW
YORK

AMERICAN STEAMSHIP OWNERS
MUTUAL
PROTECTION AND INDEMNITY
ASSOCIATION, INC.,

No. 04-cv-04309 (LAK)

Plaintiff,

-against-

ALCOA STEAMSHIP CO., INC., et al.,

(ECF Case)

Defendant

**NOTICE OF MOTION FOR
ADMISSION PRO HAC VICE**

FILED
2006 JUL 25 PM 4:10
S.D. OF N.Y.

PLEASE TAKE NOTICE that, upon the annexed Affidavit of EDWARD A. KEANE,

sworn to on July 25, 2006, and the exhibit annexed thereto, defendants Dow Chemical

Company and Union Carbide Corporation, will move this Court, before the Honorable

Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, New York, New

York for an Order, pursuant to Rule 1.3(c) of the Local Rules of the Southern District of

New York, admitting STEVEN R. GILFORD, a member of the bar of the State of Illinois, to the bar of this Court *pro hac vice*.

Dated: New York, New York
July 24, 2006

MAHONEY & KEANE, LLP
Attorneys for Defendants
The Dow Chemical Company and
Union Carbide Corporation

By: 

Edward A. Keane (EK1398)
111 Broadway
New York, NY 10006
(212) 385-1422

TO: NOURSE & BOWLES, LLP
Attorneys for Plaintiff
One Exchange Plaza
New York, New York 10006
(212) 952-6200

All counsel.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS
MUTUAL
PROTECTION AND INDEMNITY
ASSOCIATION, INC.,

No. 04-cv-04309 (LAK)

Plaintiff,
-against-

ALCOA STEAMSHIP CO., INC., et al.,

(ECF Case)

Defendants.

**AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION
PRO HAC VICE PURSUANT TO
LOCAL RULE 1.3(C)**

STATE OF NEW YORK)
)
COUNTY OF NEW YORK)

EDWARD A. KEANE, being duly sworn, hereby deposes and says:

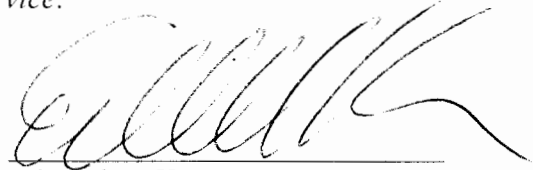
1. I am a member of the bar of this Court and am a partner of the law firm of MAHONEY & KEANE, LLP, counsel for defendants The Dow Chemical Company ("Dow Chemical") and Union Carbide Corporation ("UCC") in this action. I submit this affidavit in support of defendants Dow Chemical and UCC's motion, pursuant to Rule 1.3(c) of the Local Rules for the Southern District of New York, for the admission of STEVEN R. GILFORD to the bar of this Court *pro hac vice*.

2. STEVEN R. GILFORD is a member of the law firm of MAYER, BROWN ROWE and MAW,. Mr. Gilford is and has been a member in good

standing of the bar of the State of Illinois since 1978. Mr. Gilford is familiar with the Federal Rules of Civil Procedure and with the Rules of this Court.

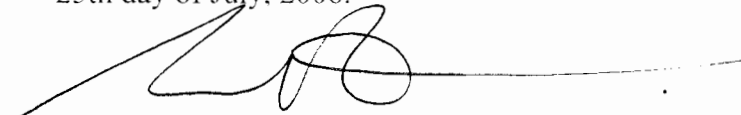
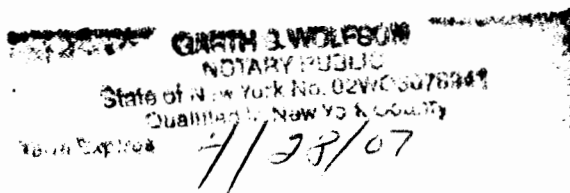
3. A certificate of Mr. Gilford's membership in good standing of the bar of the State of Illinois, issued within 30 days of the date hereof, is attached to this affidavit as Exhibit A.

4. Accordingly, I respectfully request that Steven R. Gilford be admitted to the Bar of this Court *pro hac vice*.



Edward A. Keane (EK 1398)

Sworn to before me this
25th day of July, 2006.


NOTARY PUBLIC

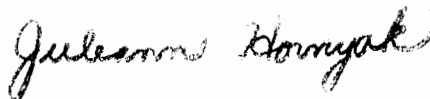
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Steven R. Gilford

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 3, 1978 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Friday, June 30, 2006.

A handwritten signature in cursive script, reading "Juleann Hornyak".

Clerk

STATE OF NEW YORK :
: SS.:
COUNTY OF NEW YORK :

MARIE T. CUSH being sworn says: I am not a party to the action, am over 18 years of age and reside at 311 Travers Place, Lyndhurst, N.J.

On July 24, 2006, I served a true copy of the annexed NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE*, PROPOSED ORDER AND AFFIDAVIT OF EDWARD A. KEANE, IN SUPPORT OF MOTION

TO: NOURSE & BOWLES, LLP
Attorneys for Plaintiff
One Exchange Plaza
New York, New York 10006
(212) 952-6200

on this date by mailing the same in a sealed envelope, with postage prepaid thereon, in an official depository of the U.S. Postal Service.


MARIE T. CUSH

Sworn to before me this
24th day of July, 2006



Notary Public

GARTH S. WOLFSON
NOTARY PUBLIC
State of New York No. 02WO5076941
Qualified in New York County
~~Term Expires~~ 4/22/07